

COMP

1 Alexander P. Yanko in Pro Per
 2 9001 Cape Wood St. Las Vegas, NV 89117
 3 United States District Court
 4 Clark County, Nevada

Alexander P. Yanko

Plaintiff,

vs.

Wellpath, LLC,
 Does 1-10 inclusive,

Defendant

Business Rocs 1-10 inclusive

2:22-cv-01311-GMN-DJA

Case No.: _____

Dept. No.: _____

Docket No.: <input checked="" type="checkbox"/>	FILED	RECEIVED
	ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD		
AUG 15 2022		
CLERK US DISTRICT COURT		
DISTRICT OF NEVADA		
BY: <input type="checkbox"/>	100	DEPUTY

Complaint

Plaintiff, Alexander P. Yanko in proper person
 complains against the defendant, Wellpath
 LLC, Does 1-10 inclusive; and Business Rocs 1-10
 inclusive as follows:

I Parties

1. Plaintiff, Alexander P. Yanko, (hereinafter Plaintiff), who is currently, and was at all relevant times, president of The State of Nevada, County of Clark, City of Las Vegas.

2. Defendant, Wellpath, LLC, (hereinafter Defendant Wellpath), is a Delaware corporation, based in Nashville, TN, licensed to do business in The State of Nevada, County of Clark, City of Las Vegas.

3. All the acts, and/or failures to act alleged herein, were duly performed by, and/or are attributable to defendants, individually, or acting by and through their agents and employees. Said acts, and/or failures to act, were within the scope of any agency or employment, or were ratified by defendants.

4. The names and capacities, whether individual, corporate, associate, or otherwise of defendants and/or their alter egos sued herein as Docs 1-10 inclusive and Business Rocs 1-10 inclusive, are presently unknown, and Plaintiff will amend this complaint to insert the name(s) when ascertained.

II Facts

5. Since the day Wellpath took over the medical department at the Clark County Detention Center on July 1, 2019, they ~~do~~ ~~do~~ ~~not~~ have showed deliberate difference to Plaintiff's pain and suffering.

6. Plaintiff is a diabetic, who, on the street maintains his health through healthy diet.

7. Now under Wellpath, the defendant, he takes up to three shots of insulin a day and approximately thirty or more pills a day. ¹

8. All the while his diabetes has gotten worse.

9. But more importantly his pain due to neuropathy has progressed to an 8-10 most miserable level.

10. Plaintiff, over the years has sent over five-hundred communications (texts) to Wellpath, the defendant, begging for help to no avail.

11. Plaintiff is in incredible pain due to this neuropathy yet the defendant refuses to give him the proper treatment to relieve the pain.

12. Defendant has him on a minimum dosage of Gabapentin, a nerve blocker used to treat neuropathy.

13. No matter how much Plaintiff brings the defendant's attention to his suffering they do nothing except to say, "Please discuss this at your next chronic pain consultation."

14. At the chronic pain consultation they say, "Yeah, sure" then do nothing.

15. Defendant has shown deliberate indifference to all of Plaintiff's health issues.

16. Why else would he go from no shots to three or more shots a day?

17. Why else would his neuropathy
 1 start deteriorating to the point it keeps
 2 him up all night long.

18. Why does defendant refuse to
 2 raise the amount of compensation
 3 the Plaintiff is given when they
 4 know it is a safe, tried, and true
 5 way to lessen the pain of neuropathy.

19. Just for the record, Neuropathy
 2 is the nerves dying in the feet, legs
 3 hands, and arms. The pain cannot
 4 be described but has to be felt to
 5 have someone understand.

20. The fact is Defendant Wellpath
 2 does not care about Plaintiff or any
 3 of their patients.

21. Defendant Wellpath only
 2 cares about the bottom line.
 3 III Claims for Relief

22. The claim is simple, "Deliberate
 2 Indifference." Defendant Wellpath
 3 simply does not care if Plaintiff
 4 is in pain or not.

23. Nor do they, God forbid, treat
 2 Plaintiff, get better. Then they wouldn't
 3 be able to stick the country for his
 4 medical care.

28. IV Prayer for Relief

1. Plaintiff wants four and a half million
2. dollars (\$4,500,000.00). One million for each
3. year he's had to endure their mistreat-
4. ment +
5. 2. Ten million punitive damages (\$10,000,000.00).
6. 3. For interest at the statutory rate (and)
7. 4. For such other and further relief as
8. this court deems just and equitable.

9.
10.
11.
12.
13.
14. DATED THIS 25 day of June, 2022

15. I, Alexander P. Yankos, do

16. solemnly swear, under the penalty of perjury, that

17. the above Complaint is accurate,

18. correct, and true to the best of my knowledge.

19. NRS 171.102 and NRS 208.165.

20. Respectfully submitted,

21. 
22. 
23. Plaintiff

24. NRS 208.165 A prisoner may execute any instrument by signing his name immediately
25. following a declaration "under penalty of perjury" with the same legal effect as if he had
26. acknowledged it or sworn to its truth before a person authorized to administer oaths. As used in
27. this section, "prisoner" means a person confined in any jail or prison, or any facility for the
28. detention of juvenile offenders in this state.

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US DISTRICT COURT
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